

REMARKS

Claims 12-13 and 17-18 have been cancelled.

Claims 45-50 were withdrawn from consideration as the result of a restriction requirement.

New claims 51-55 have been added.

Claims 1-11, 14-16, 19-44 and 51-55 are pending for further examination.

Claim 42 has been amended to correct a typographical error and thus provide proper antecedent basis for the phrase "interrupt portion" in claim 43. Applicant respectfully requests withdrawal of the rejection of claim 43 under 35 U.S.C. 112, par. 2.

The applicant thanks the Examiner for indicating that claims 25-30 are allowed and that claims 11, 18, 24 and 39-44 include allowable subject matter.

The remaining claims were rejected over the prior art as follows:

- Claims 19, 21, 23, 31-33, 35, 36 and 38 were rejected as anticipated by U.S. Patent No. 4,913,341 (Bachman).
- Claims 1-9 and 17 were rejected as unpatentable over the combination of U.S. Patent Nos. 5,662,202 (Suris) and 5,251,738 (Dabrowski).
- Claim 10 was rejected as unpatentable over the combination of the Suris and Dabrowski patents in view of U.S. Patent No. 4,655,391 (Granzow et al.).
- Claims 12-14 were rejected as unpatentable over the combination of the Suris and Dabrowski patents in view of U.S. Patent No. 4,513,439 (Gorgone et al.).
- Claims 15-16 were rejected as unpatentable over the combination of the Suris and Dabrowski patents in view of U.S. Patent No. 3,918,371 (Gartner et al.).
- Claim 20 was rejected as unpatentable over the combination of the Bachman patent in view of U.S. Patent No. 4,638,746 (Ishigure).



- Claims 22 and 34 were rejected as unpatentable over the combination of the Bachman and Granzow patents.
- Claim 37 was rejected as unpatentable over the combination of the Bachman and Suris patents.

As discussed below, applicant respectfully submits that the pending claims are patentable over the cited references.

Claims 1-9 are patentable over the combination of  
U.S. Patent Nos. 5,662,202 (Suris) and 5,251,738 (Dabrowski)

Independent claim 1 has been amended to clarify that the cassette has a single wall construction comprising a plastic shell. That particular novel combination of features can simplify the design while maintaining a durable cassette. Neither the Suris patent nor the Dabrowski patent discloses the material for the cassette, and there is simply no suggestion that a plastic material is used. Indeed, the Office action does not even provide a *prima facie* case of obviousness because it does not address the "single wall construction" and "plastic" limitations. Dependent claims 2-8 set forth additional details that are not suggested by the cited references.

Previously, in order to provide a durable cassette for a banknote processor, cassettes typically were made using a material such as metal or, if a plastic material was used, a dual container construction (i.e., a container within a container construction) was required. The inventors of this application have recognized that a single wall construction including a plastic shell can provide many of the advantages of other known durable cassettes, while using a simpler design. The fact that using the claimed combination of features might have been obvious to try is irrelevant. That is not the test for obviousness under 35 U.S.C. 103. Moreover, if it were known, one would have expected such a simpler design to have been used.

For at least those reasons, claims 1-9 should be allowed.

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Furthermore, the additional limitations of claim 9 are not disclosed or suggested by the Suris or Dabrowsky patents. A flexible handle, for example, may allow the handle to deflect or lie flat against the cassette to avoid collision with a cashbox door and any lock assemblies that may be part of the host machine (*see, e.g.*, Specification, page 4, lines 3-11). Such a flexible handle is not disclosed or suggested by the cited references. Although the Suris patent discloses a handle 138 (FIG. 1), there is no suggestion that the handle is "flexible" as recited in the pending claim. Similarly, the handle 78 (FIG. 4) in the Dabrowski patent is not flexible. Neither of those references discloses an "integrated grip," which also can be advantageous, as discussed, for example at page 4, lines 14-23 of the Specification.

Claim 9 should be allowable for those additional reasons as well.

Claim 10 is allowable over the combination of the Suris and Dabrowski patents in view of U.S. Patent No. 4,655,391 (Granzow et al.)

Claim 10 has been re-written in independent form and also recites the "single wall construction" and "plastic" limitations as recited in claim discussed above. In addition, claim 10 has been amended to clarify that the aperture or transparent window is located to allow visual inspection *of a document stored in the cassette*.

As noted in the Office action, the Granzow et al. patent discloses a transparent window 108 in the cassette 20. However, the window 108 allows one to view the indicator 82 which indicates the number of times the access door was opened (*see* col. 5, line 63 – col. 6, line 8). The window 108 and openings 102, 104 do not allow visual inspection of a document stored in the cassette. Nor does the window 108 allow visual inspection of the most recent document stored in the cassette as recited in claim 51.

Therefore, claim 10, as well as dependent claims 11 and 51, should be allowable.

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Claims 15-16 are patentable over the combination of the Suris  
and Dabrowski patents in view of U.S. Patent No. 3,918,371 (Gartner et al.)

Claims 15 has been amended to clarify that the hinge pin is for securing the access door to the plastic shell. Claim 16 has amended in a similar manner.

Those claims are distinguished from the cited references for the reasons discussed above with respect to claim 1.

The Office action points to the Gartner et al. patent for its disclosure of hinge pins and lugs. That patent discloses a safe deposit construction with interconnecting doors 20a, 20b. Lugs 46 (FIGS. 2 and 3) on the doors fit into mounting holes 16 to secure the doors to the safe deposit box cells. In contrast, the function of the hinge pins 44, which fit into hinge knuckles 35 is to hold two adjacent doors together with one another. The hinge pins 44 do not secure the doors to the frame 12, which is the function of the lugs 46. The fact that, if the hinge pins 44 are removed, the doors may remain secure, is irrelevant because the hinge pins 44 do not satisfy the limitation of a hinge pin to "secure the access door to the plastic shell" as recited in claims 15 and 16.

Therefore, dependent claims 15 and 16 should be allowable as well.

Claim 14 is patentable over the combination of the Suris  
and Dabrowski patents in view of U.S. Patent No. 4,513,439 (Gorgone et al.)

Claim 14 has been re-written to include the limitations of claim 12 and 13. Claim 14 now recites, in part, that the rotating rollers are formed by a two-shot injection molding process. Such rollers can simplify the manufacture of the apparatus. Although the general use of such two-shot injection molding processes is known (see Specification, page 9, lines 14-16), the use of rollers formed by a two-shot injection molding process and used for transporting documents was *not* previously known or suggested by the prior art. Indeed, none of the cited references refers to a two-shot injection molding process, and the Office action does not address that feature, which was recited in claim 13 as originally filed. Therefore, a *prima facie* case of obviousness has not been shown, and claim 13 also should be allowable. A conclusion of obviousness would be

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based on precisely the type of improper hindsight that the Court of Appeals for the Federal Circuit has warned against.

Submitted concurrently with this Reply is an Information Disclosure Statement, including a copy of U.S. Patent No. 5,632,367, which is assigned to the assignee of the pending application. That patent discloses the use of two-shot injection molding process, but only in connection with the validator housing, not with rollers for transporting documents. In sum, there is simply no "clear and particular" suggestion of the subject matter of claim 14 as required by the Federal Circuit. *See, e.g., C.R. Bard, Inc. v. M3 Sys., Inc.*, 157 F.3d 1340, 1352, 48 USPQ2d 1225, 1232 (Fed. Cir. 1998). Accordingly, claim 14 should be allowed.

Claims 19, 21, 23 36 and 38 are not anticipated  
by U.S. Patent No. 4,913,341 (Bachman)

Independent claim 19 has been amended to clarify that the guide means guides the cassette during installation and that the latch means is for engagement during installation. If the cassette is not securely latched during installation, then a biasing means moves the cassette. An example of that is illustrated through FIGS. 11 and 12. If, for example, an attempt to insert a cassette into the chassis is unsuccessful, then an ejector spring 20 pushes the cassette back toward the operator.

The Office action refers to the bias means 98 disclosed in the Bachman patent as corresponding to the claimed "biasing means." Applicant respectfully disagrees.

The Bachman patent discloses a currency storage device having a currency storage tray 18 and an outer drawer 16 (*see* FIG. 1). As shown in FIG. 6, the outer drawer 16 has a currency positioning means 68 including a plunger 78. The positioning means 68 is normally biased in a first position by the bias means or spring 98 (col. 4, lines 20-39). When the plunger 78 moves to the second position, currency A may be fed to the inner storage tray 18 (col. 5, lines 58-62).

In any event, it is clear that the bias means (or spring) 98 disclosed in the Bachman patent causes movement of the currency positioning means 68; it does not move the outer drawer 16 or the currency storage tray 18. Indeed, the bias means 98 has nothing to do with whether either of

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the outer drawer 16 or storage tray 18 is securely latched or not. Therefore, the bias means 98 does not perform the function of moving the cassette if the cassette is not securely latched as recited in claim 19. Nor does the bias means 98 means move the cassette "in a direction away from an installation direction" as recited in dependent claim 52.

In view of the foregoing remarks, applicant respectfully requests reconsideration and withdrawal of the rejections of claim 19 and dependent claims 21 and 23. New claim 52 should be allowed as well.

Independent claim 36 has been amended to clarify that the latching means is to secure the cassette. Claim 36 also recites a biasing means, wherein if the cassette is not securely latched to the chassis then the biasing means moves the cassette. As discussed above, the bias means (or spring) 98 disclosed in the Bachman patent does not move the outer drawer 16 or the storage tray 18, and has nothing to do with whether either of the outer drawer 16 or storage tray 18 is securely latched or not. Therefore, the Bachman patent does not disclose (or suggest) the limitation of claim 36 that "if the cassette is not securely latched to the chassis then the biasing means moves the cassette."

In view of the foregoing remarks, applicant respectfully submits that claim 36, as well as dependent claim 38, should be allowed.

Claim 20 is patentable over the combination of the  
Bachman patent in view of U.S. Patent No. 4,638,746 (Ishigure)

Claim 20, which depends from claim 19, is patentable over the cited references at least for the reasons discussed above with respect to claim 19. The Ishigure patent adds nothing with respect to the limitations that are missing from the Bachman patent.

Applicant respectfully requests reconsideration of the rejection of claim 20.

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Claim 22 is patentable over the combination  
of the Bachman and Granzow patents

Claim 22, which depends from claim 19, is patentable over the cited references at least for the reasons discussed above with respect to claim 19. The Granzow patent adds nothing with respect to the limitations that are missing from the Bachman patent.

Furthermore, claim 22 (like claim 10 discussed above) has been amended to recite that the aperture or transparent window is located to allow visual inspection of a document stored in the cassette. The Granzow patent does not disclose or suggest that feature. Instead, the window 108 disclosed in the Granzow patent allows one to view the indicator 82 which indicates the number of times the access door was opened (*see* col. 5, line 63 – col. 6, line 8). The window 108 and openings 102, 104 do not allow visual inspection of a document stored in the cassette.

For the foregoing reasons, claim 22 should be allowed as well.

Claim 37 is patentable over the combination  
of the Bachman and Suris patents

Claim 37, which depends from claim 36, is patentable over the cited references at least for the reasons discussed above with respect to claim 36. The Suris patent adds nothing with respect to the limitations that are missing from the Bachman patent.

Claims 31-33 and 35 are not anticipated  
by U.S. Patent No. 4,913,341 (Bachman)

Independent claim 31 recites a method that includes pushing a lockable removable cassette with force sufficient to overcome the resistance of a biasing means to secure the cassette.

The Office action does not discuss in any detail how the Bachman patent anticipates claim 31 or dependent claims 32-33 and 35.

The Bachman patent does disclose a bias means (or spring) 98. However, as discussed above, the bias means (or spring) 98 is used to bias the positioning means 68 in a normal, first

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position (col. 4, lines 20-39). When a plunger 78 moves to the second position, currency A may be fed to an inner storage tray 18 (col. 5, lines 58-62).

It is clear that the bias means 98 in the Bachman patent has nothing to do with pushing or otherwise moving a cassette. Nor does the bias means have anything to do with securing the cassette. Therefore, the Bachman patent does not disclose or suggest "pushing the . . . cassette . . . to overcome the resistance of a biasing means to secure the cassette" as recited in claim 31.

In view of the foregoing remarks, applicant respectfully requests reconsideration and withdrawal of the rejections of claim 31 and dependent claims 32-33 and 35.

Claim 34 is patentable over the combination  
of the Bachman and Granzow patents

Claim 34, which depends from claim 31, is patentable over the cited references at least for the reasons discussed above with respect to claim 31. The Granzow patent adds nothing with respect to the limitations that are missing from the Bachman patent.

Furthermore, claim 34 has been amended to recite "observing a document stored in the cassette through at least one of an aperture or transparent window". The apparatus disclosed by the Granzow patent does not allow for such observation. As already discussed above, the window 108 disclosed in the Granzow patent allows one to view the indicator 82 which indicates the number of times the access door was opened (*see* col. 5, line 63 – col. 6, line 8). The window 108 and openings 102, 104 do not allow observation of a document stored in the cassette.

For the foregoing reasons, claim 34 should be allowed as well.

New claims 53-55

New claims 53-55 are presented. Allowance of those claims is respectfully requested.

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Applicant : Bergeron et al.  
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Page : 21 of 21

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### The Drawings

The drawings have been amended as required by the Examiner to correct various informalities and objections. The replacement set of drawings is a complete set of formal drawings. No new matter has been added. Approval of the replacement drawings is requested.

The Brief Description of the Drawings section of the Specification has been amended to conform to the drawing changes.

### Information Disclosure Statement

Applicant submits with this Reply a supplemental Information Disclosure Statement. The Examiner is kindly requested to mail to the applicant an initialed copy of the form 1449 indicating consideration of the listed information.

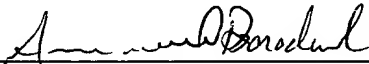
### Conclusion

Applicant respectfully requests allowance all pending claims.

Enclosed is a \$156 check for excess claims. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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